

# EXHIBIT A

HON. PATRICK OISHI

SUPERIOR COURT OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

ASHA SINGH, personally  
and as personal representative  
of the ESTATE OF NARENDRA  
P. SINGH,  
Plaintiffs

CAUSE NO. 18-2-23054-3 SEA


NOTICE OF STATUTORY  
STATUTORY ATTORNEY'S LIEN  
AS PER RCW 60.40.010

vs  
State of Washington. UNIVERSITY  
OF WASHINGTON, and JOHN

TO: CLERK OF COURT; and  
TO: ALL PARTIES AND COUNSEL OF RECORD; and  
TO: ALL INTERESTED PARTIES AND DEBTORS OF ASHA SINGH

PLEASE TAKE NOTICE THAT pursuant to RCW 60.40.010, David B. Adler, esq.,  
WSBA # 16585, as undersigned counsel of record, is asserting a statutory lien for unpaid attorney's  
fees incurred in this case as counsel for the Plaintiff. The Amount of the Lien as of this date is:  
\$35,015.00. This lien is applicable to any funds held or received by ASHA SINGH in any capacity  
resulting directly or indirectly from Attorney's efforts in representing the interests of the Plaintiff as  
a personal representative of the Estate of Narendra Singh against the Defendant.

Dated this 13<sup>th</sup> day of September, 2019.

  
DAVID B. ADLER, Attorney for Asha Singh, P.R.  
WSBA # 16585

CERTIFICATE OF SERVICE

DAVID B. ADLER, ESQ.  
1001-Fourth Avenue, Suite 3218  
Seattle, Washington 98154  
Telephone: (206) 292-2267  
Wash. Bar #16585

1 I, DAVID B. ADLER, under oath do solemnly declare that on September 12, 2019 I served the  
2 following documents upon the following persons via the Clerk's electronic filing system and also  
by transmitting via E-mail a true and correct copy to the following document.

3 1. DOCUMENTS:

4 A. NOTICE OF STATUTORY ATTORNEY'S LIEN AS PER RCW 60.40.010

5 2. PERSONS SERVED:

6 A. Seth Bernstein

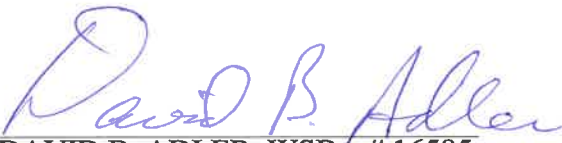
1191-Second Avenue, # 1800  
Seattle, Washington 98101

7 B. Adelle Greenfield

1191-Second Avenue, # 1800  
Seattle, Washington 98101

8 C. Rima Kapitan

PO Box 6779  
Chicago, Illinois 60680  
rkapitan@kapitanlaw.net

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DAVID B. ADLER, WSBA # 16585

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**DAVID B. ADLER, ESQ.**  
1001-Fourth Avenue, Suite 3218  
Seattle, Washington 98154  
Telephone: (206) 292-2267  
Wash. Bar #16585

# EXHIBIT B

IN THE SUPERIOR COURT OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

ASHA SINGH, personally and as Personal  
Representative of the Estate of NARENDRA  
P. SINGH,

Plaintiff/Petitioner,

v.

STATE OF WASHINGTON, a governmental  
entity; UNIVERSITY OF WASHINGTON, a  
Washington State entity; and JOHN DOES 1-  
5,

Defendant/Respondent.

No. 18-2-23054-3 SEA

Hon. Patrick Oishi

NOTICE OF ATTORNEY'S LIEN

TO: CLERK OF COURT

AND TO: ALL PARTIES AND COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to RCW 60.40.010, Rima Kapitan of Kapitan Law  
Office, Ltd. hereby asserts a lien for attorney's fees based on legal services performed in the  
form of 1) \$2,787 plus interest and 2) an additional fee for services in quantum meruit as  
compensation for her contingency fee.

WHEREFORE, notice is hereby given to all interested parties of the attorney's lien against any  
recovery or proceeds obtained by the plaintiffs in this matter.

Respectfully submitted this 22<sup>nd</sup> day of December 2020.

NOTICE OF ATTORNEY'S LIEN

RIMA KAPITAN  
KAPITAN LAW OFFICE, LTD.  
P.O. BOX 6779, CHICAGO, IL 60680  
Phone: 312-566-9590

/s/ Rima N. Kapitan

Rima Kapitan (admitted *pro hac vice*)  
Kapitan Law Office, Ltd.  
P.O. Box 6779, Chicago, IL 60680  
(312) 566-9590  
(312) 566-9591 (Fax)  
[rima@kapitanlaw.net](mailto:rima@kapitanlaw.net)

#### CERTIFICATE OF SERVICE

I, Rima Kapitan, certify under penalty of perjury under the laws of the State of Washington that on December 22, 2020, I caused the foregoing motion to be filed electronically through the King County Superior Court e-filing system and served on the person(s) identified below via email and E-Service:

Lucinda Luke  
Rory Cosgrove  
Carney Badley Spellman, P.S.  
[luke@carneylaw.com](mailto:luke@carneylaw.com)  
[cosgrove@carneylaw.com](mailto:cosgrove@carneylaw.com)

Seth Berntsen  
Hathaway Burden  
Summit Law Group PLLC  
[sethb@summitlaw.com](mailto:sethb@summitlaw.com)  
[hathawayb@summitlaw.com](mailto:hathawayb@summitlaw.com)

Emanuel Jacobowitz  
Nathan J. Arnold  
Priya Sinha Cloutier  
CLOUTIER ARNOLD JACOBOWITZ PLLC  
[manny@cajlawyers.com](mailto:manny@cajlawyers.com)  
[nathan@cajlawyers.com](mailto:nathan@cajlawyers.com)  
[priya@cajlawyers.com](mailto:priya@cajlawyers.com)

Asha Singh  
Through counsel, at her home address and via electronic mail

/s/ Rima Kapitan

IN THE SUPERIOR COURT OF WASHINGTON  
IN AND FOR THE COUNTY OF KING

ASHA SINGH, personally and as Personal  
Representative of the Estate of NARENDRA  
P. SINGH,

Plaintiff/Petitioner,

v.

STATE OF WASHINGTON, a governmental  
entity; UNIVERSITY OF WASHINGTON, a  
Washington State entity; and JOHN DOES 1-  
5,

Defendant/Respondent.

No. 18-2-23054-3 SEA

Hon. Patrick Oishi

NOTICE OF ATTORNEY'S LIEN

TO: CLERK OF COURT

AND TO: ALL PARTIES AND COUNSEL OF RECORD

PLEASE TAKE NOTICE that pursuant to RCW 60.40.010, Rima Kapitan of Kapitan Law  
Office, Ltd. hereby asserts a lien for attorney's fees based on legal services performed in the  
form of 1) \$2,787 plus interest and 2) an additional fee for services in quantum meruit as  
compensation for her contingency fee.

WHEREFORE, notice is hereby given to all interested parties of the attorney's lien against any  
recovery or proceeds obtained by the plaintiffs in this matter.

Respectfully submitted this 1<sup>st</sup> day of February, 2021.

NOTICE OF ATTORNEY'S LIEN

RIMA KAPITAN  
KAPITAN LAW OFFICE, LTD.  
P.O. BOX 6779, CHICAGO, IL 60680  
Phone: 312-566-9590

/s/ Rima N. Kapitan

Rima Kapitan (admitted *pro hac vice*)  
Kapitan Law Office, Ltd.  
P.O. Box 6779, Chicago, IL 60680  
(312) 566-9590  
(312) 566-9591 (Fax)  
[rima@kapitanlaw.net](mailto:rima@kapitanlaw.net)

#### CERTIFICATE OF SERVICE

I, Rima Kapitan, certify under penalty of perjury under the laws of the State of Washington that on February 1, 2021, I caused the foregoing motion to be filed electronically through the King County Superior Court e-filing system and served on the person(s) identified below via email and E-Service:

Lucinda Luke  
Rory Cosgrove  
Carney Badley Spellman, P.S.  
[luke@carneylaw.com](mailto:luke@carneylaw.com)  
[cosgrove@carneylaw.com](mailto:cosgrove@carneylaw.com)

Seth Berntsen  
Hathaway Burden  
Summit Law Group PLLC  
[sethb@summitlaw.com](mailto:sethb@summitlaw.com)  
[hathawayb@summitlaw.com](mailto:hathawayb@summitlaw.com)

Emanuel Jacobowitz  
Nathan J. Arnold  
Priya Sinha Cloutier  
CLOUTIER ARNOLD JACOBOWITZ PLLC  
[manny@cajlawyers.com](mailto:manny@cajlawyers.com)  
[nathan@cajlawyers.com](mailto:nathan@cajlawyers.com)  
[priya@cajlawyers.com](mailto:priya@cajlawyers.com)

Asha Singh  
Through counsel and via electronic mail

/s/ Rima Kapitan



# EXHIBIT C

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR KING COUNTY

ASHA SINGH, personally and as Personal  
Representative of the Estate of NARENDRA  
P. SINGH,

Plaintiffs,

v.

STATE OF WASHINGTON, a governmental  
entity; UNIVERSITY OF WASHINGTON, a  
Washington State entity; and JOHN DOES 1-  
5,

Defendants.

No. 18-2-23054-3

NOTICE OF ATTORNEY'S LIEN

NOTICE IS HEREBY GIVEN that the undersigned attorneys claim a lien pursuant to RCW 60.40.010 for their services rendered to Plaintiff Asha Singh with interest from the date of filing this claim of lien. Said claim is for reasonable compensation for services rendered to-date and for any unreimbursed costs advanced to date with respect to the appeal to the Court of Appeals, Division I, in Cause No. 80662-9-I.

The claim of lien is for the sum of \$7,250.00 plus interest, and is the reasonable compensation for services rendered which are still due and owing. Judgment interest at the rate of 12% will accrue from this date.

1 DATED this 9th day of May, 2022.

2 Philip A. Talmadge

3 Philip A. Talmadge, WSBA #6973

4 Aaron P. Orheim, WSBA #47670

5 Talmadge/Fitzpatrick

6 2775 Harbor Avenue SW

7 Third Floor, Suite C

8 Seattle, WA 98126

9 (206) 574-6661

10 Attorneys for Plaintiff

11 Asha Singh

12 STATE OF WASHINGTON )

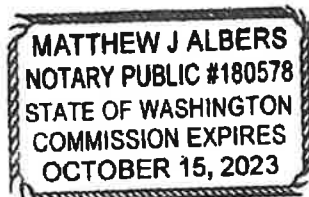
13 ) ss.

14 County of King )

15 On this day personally appeared before me Philip A. Talmadge, attorney for defendant,  
16 and to me known to be the individual described in and who executed the within and foregoing  
17 instrument, and acknowledged that he signed the same as his free and voluntary act and deed for  
18 the uses and purposes therein mentioned.

19 SUBSCRIBED AND SWORN to before me this 9th day of May, 2022.

20 Matthew J. Albers  
21 (signature of notary)



22 MATTHEW J. ALBERS

23 (type or print name of notary)

24 Notary Public in and for the State of Washington

My appointment expires 10/15/2023

DECLARATION OF SERVICE

On said day below I had delivered by U.S. Mail a true and accurate copy of the *Notice of Attorney Lien* in King County Superior Court Cause No. 18-2-23054-3 to the following:

Seth J Berntsen, WSBA #30379  
Hathaway Burden, WSBA #52970  
Summit Law Group PLLC  
315 5th Ave. S, Suite 1000  
Seattle, WA 98104-2682

Rory D. Cosgrove, WSBA #48647  
Lucinda Luke WSBA #26783  
Carney Badley Spellman, P.S.  
701 Fifth Ave., Suite 3600  
Seattle, WA 98104-7010

Patricia Sue Rose WSBA #19046  
Law Office of Patricia Sue Rose  
1455 NW Leary Way Ste 400  
Seattle, WA 98107-5138

Gail Luhn WSBA #27104  
4500 9<sup>th</sup> Ave NE Ste 300  
Seattle, WA 98105-4762

Delivered via Email:  
Asha Singh  
[Ashasingh2715@gmail.com](mailto:Ashasingh2715@gmail.com)

Original delivered by ABC Legal  
to King County Superior Court Clerk's Office

I declare under penalty of perjury under the laws of the State of Washington and the United States that the foregoing is true and correct.

DATED: May 9th, 2022, at Seattle, Washington.

/s/ Brad Roberts  
Brad Roberts, Legal Assistant  
Talmadge/Fitzpatrick

DECLARATION

# EXHIBIT D

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING**

ASHA SINGH, personally and as  
Personal Representative of the ESTATE  
OF NARENDRA P. SINGH,

Plaintiffs,

v.

UNIVERSITY OF WASHINGTON,

Defendant.

**NO. 18-2-23054-3**

**JUDGMENT AND JUDGMENT  
SUMMARY**

**I. JUDGMENT SUMMARY**

Judgment Creditor	Asha Singh as Personal Representative of The Estate of Narendra P. Singh
Attorneys for Judgment Creditor	Riverside NW Law Group, PLLC Matthew Z. Crotty & Asti M. Gallina 905 W. Riverside Ave., Ste. 208 Spokane, WA 99201
Judgment Debtor	University of Washington
Principal Judgment Amount	\$120,000.00
Attorneys for Judgment Debtors	Summit Law Group, PLLC Seth J. Berntsen & Hathaway Burden 315 5th Avenue S. Ste. 1000 Seattle, WA 98104

**JUDGMENT AND JUDGMENT  
SUMMARY - 1**

1 Total Taxable Costs, Attorneys' Fees and N/A  
2 Other Post Judgment Relief

3 Prejudgment Interest N/A

4 Post judgment Interest N/A

5  
6 Total Judgment Amount \$120,000.00  
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8  
9  
10 **II. ORDER**

11 This case was set for trial on April 22, 2024. On March 26, 2024, pursuant to CR 68,  
12 Defendant made an offer of judgment in the amount of one hundred twenty thousand dollars  
13 (\$120,000), inclusive of all damages, costs, and reasonable attorneys' fees. On April 5, 2024,  
14 Plaintiff accepted the offer of judgment and notified the Court of the same.

15 It appearing from the records of the Court that the judgment should be entered in the  
16 amount offered by Defendant under CR 68, and the Court being fully advised:

17 IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Plaintiff is hereby  
18 awarded judgment against Defendant University of Washington in the total amount of  
19 \$120,000.00.

20 DATED this \_\_\_\_\_ day of April 2024.

21 \_\_\_\_\_  
22 THE HONORABLE JUDGE BERNS  
23



1 Presented by:

2 RIVERSIDE NW LAW GROUP, PLLC

3 /s/ Matthew Crotty

4 /s/ Asti Gallina

Matthew Crotty, WSBA #39284

Asti Gallina, WSBA #53361

5 905 West Riverside, Suite 208

Spokane, WA 99201

6 Telephone: (509) 850-7011

mzc@riverside-law.com

7 [amg@riverside-law.com](mailto:amg@riverside-law.com)

*Attorneys for Plaintiff*

8  
9 Approved as to form, presentment waived:

10 SUMMIT LAW GROUP, PLLC

11 /s/ Seth Berntsen

Seth Berntsen, WSBA #30379

12 Hathaway Burden, WSBA #52970

SUMMIT LAW GROUP

13 315 Fifth Avenue S., Suite 1000

Seattle, WA 98104

14 (206) 676-7000

[sethb@summitlaw.com](mailto:sethb@summitlaw.com)

15 [hathawayb@summitlaw.com](mailto:hathawayb@summitlaw.com)

*Attorneys for Defendant*

King County Superior Court  
Judicial Electronic Signature Page

Case Number: 18-2-23054-3  
Case Title: SINGH ET ANO VS STATE OF WASHINGTON ET ANO  
Document Title: ORDER  
  
Signed By: Elizabeth Berns  
Date: April 18, 2024



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Judge: Elizabeth Berns

This document is signed in accordance with the provisions in GR 30.

Certificate Hash: 7EDDC69DA2C5AE409184A94FD3AA1B48F8FF6FC3  
Certificate effective date: 7/17/2023 1:41:04 PM  
Certificate expiry date: 7/17/2028 1:41:04 PM  
Certificate Issued by: C=US, E=kcscefiling@kingcounty.gov, OU=KCDJA,  
O=KCDJA, CN="Elizabeth Berns:  
Fh5QaNsk7hGZ2uE4zbJ6iw=="

# EXHIBIT E

**From:** [Jeffrey T. Kestle](#)  
**To:** [mzc@riverside-law.com](mailto:mzc@riverside-law.com); [Seth Berntsen](#)  
**Subject:** Singh v. UW - Estate of David Adler Lien  
**Date:** Monday, April 22, 2024 9:57:42 AM  
**Attachments:** [0.png](#)  
[Singh - Attorney's Lien.pdf](#)

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Dear Matt and Seth:

I represent Susan Adler, the personal representative of the Estate of David Adler. Mr. Adler previously represented Asha Singh in Singh v. University of Washington, King County Superior Court Case No. 18-2-23054-3.

On September 13, 2019, Mr. Adler filed the attached Notice of Statutory Attorney's Lien pursuant to RCW 60.40.010. The claimed lien amount was \$35,015.

I have gone through Mr. Adler's billing records and determined that the unpaid principal balance is \$34,143.48. Mr. Adler's engagement agreement called for interest on unpaid fees at 1.0% per month, which works out to \$341.43 per month. It's been 55 months since Mr. Adler filed the Notice of Lien, so accrued interest to date is at least \$18,778.65.

The purpose of this email is to confirm that my client seeks to foreclose on the lien, the amount of which is now at least \$52,922.13. Pursuant to RCW 60.40.010(1)(c), the lien attaches to "money in the hands of the adverse party in an action or proceeding in which the attorney was employed, from the time of giving notice of the lien to that party." In this case, the adverse party is the University of Washington. Pursuant to RCW 60.40.010(1)(d), the lien also attaches to "an action . . . and its proceeds . . . for the sum due under [the fee agreement]." In this case, the lien attaches to a portion of the \$125,000 settlement proceeds. Pursuant to RCW 60.40.010(4), the lien created by subsection (1)(d) "is not affected by settlement between parties to the action until the lien . . . is satisfied in full."

Matt, do you have time for a call this week to discuss my client's claim?

Thanks.

Jeff

**Jeffrey T. Kestle**  
Shareholder

**Forsberg & Umlauf, P.S.**  
901 Fifth Avenue, Suite 1400  
Seattle, WA 98164  
DIRECT 206-267-2270  
OFFICE 206-689-8500

FAX 206-689-8501

EMAIL [JKestle@FoUm.law](mailto:JKestle@FoUm.law)



--CONFIDENTIALITY NOTICE--

THIS MESSAGE AND/OR THE DOCUMENT(S) ACCOMPANYING THIS ELECTRONIC TRANSMISSION MAY CONTAIN PRIVILEGED AND CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF YOU ARE NOT THE INTENDED RECIPIENT, BE AWARE THAT ANY DISCLOSURE, COPYING, DISTRIBUTION OR USE OF THE CONTENTS OF THIS TRANSMISSION IS PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE NOTIFY US BY TELEPHONE, MAIL OR ELECTRONIC MAIL, AND DESTROY THIS COMMUNICATION.

# EXHIBIT F

**IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
COUNTY OF KING**

ASHA SINGH, personally and as  
Personal Representative of the ESTATE  
OF NARENDRA P. SINGH,

Plaintiffs,

v.

UNIVERSITY OF WASHINGTON,

Respondent.

**NO. 18-2-23054-3**

**AMENDED JUDGMENT AND  
JUDGMENT SUMMARY**

**I. JUDGMENT SUMMARY**

Judgment Creditor

The Estate of Narendra P. Singh

Attorneys for Judgment Creditor

Matthew Brinegar (SBN 42361)  
2000 Van Ness Avenue, Suite 512  
Tel: 415-735-6856  
mbrinegar@brinegarlaw.com  
Attorney for Plaintiff

Riverside NW Law Group, PLLC  
Matthew Z. Crotty & Asti M. Gallina  
905 W. Riverside Ave., Ste. 208  
Spokane, WA 99201  
Attorney for Plaintiff

Judgment Debtor

University of Washington

Principal Judgment Amount	\$106,000.00
Attorneys for Judgment Debtors	Summit Law Group, PLLC Seth J. Berntsen & Hathaway Burden 315 5th Avenue S. Ste. 1000 Seattle, WA 98104
Total Taxable Costs, Attorneys' Fees and Other Post Judgment Relief	N/A
Prejudgment Interest	N/A
Post judgment Interest	N/A
Total Judgment Amount	\$106,000.00

## II. ORDER

This case was set for trial on April 22, 2024. On March 26, 2024, pursuant to CR 68, Defendant made an offer of judgment in the amount of one hundred twenty thousand dollars (\$120,000), inclusive of all damages, costs, and reasonable attorneys' fees. On April 5, 2024, Plaintiff accepted the offer of judgment and notified the Court of the same. On April 18, 2024, the Court entered judgment in Plaintiff's favor in the total amount of \$120,000.

Plaintiff thereafter filed a Motion to Amend the Judgment to reduce the final, total judgment amount to \$106,000 to resolve and satisfy an October 11, 2019 judgment in this action in favor of the University's against Plaintiff ("2019 Judgment").

It appearing from the records of the Court that the judgment should be amended, and the Court being fully advised:



1 IT IS THEREFORE ORDERED, ADJUDGED AND DECREED that Plaintiff is hereby  
2 awarded amended judgment against Defendant University of Washington in the final, total  
3 amount of \$106,000, and the Defendant/Judgment Debtor University of Washington is hereby  
4 directed to promptly file a satisfaction of the 2019 Judgment. This amended judgment supersedes  
5 and replaces the April 18, 2024 judgment.

6 DATED this 28 day of May, 2024.

7  
8   
9 THE HONORABLE JUDGE BERNS